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Attorneys for Defendant
Mr. Correia

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:23-cr-00082-JAM
Plaintiff,)
vs.) STIPULATION AND ORDER TO CONTINUE
) STATUS HEARING AND EXCLUDE TIME
AARON MICHAEL CORREIA,) Date: June 4, 2024
Defendant.) Time: 9:00 a.m.
) Judge: John A. Mendez

IT IS HEREBY STIPULATED and agreed by and between United States Attorney Phillip A. Talbert, through Assistant United States Attorney Haddy Abouzeid, counsel for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Aaron Correia, that the previously scheduled Status Hearing set for June 4, 2024, be continued to **August 20, 2024, at 9:00 a.m.**

The parties specifically stipulate as follows:

- By previous order, the Status Hearing is currently scheduled for June 4, 2024 at 9:00 a.m. Time has been ordered excluded through that date.
- Mr. Correia respectfully requests that the Court continue the Status Hearing to August 20, 2024 at 9:00 a.m.
- The government has produced 101 pages and various audio recordings in discovery. Mr. Correia requires additional time to review the discovery;

investigate and research possible defenses; research potential pretrial motions; explore potential resolutions to the case; and otherwise prepare for trial.

4. Mr. Correia believes that failure to grant his motion would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
5. The government does not object to Mr. Correia's motion.
6. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), the parties request that the time period between June 4, 2024 and August 20, 2024, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public and Mr. Correia in a speedy trial.

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: May 29, 2024

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Defendant
Mr. Correia

Date: May 29, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ Haddy Abouzeid
HADDY ABOUZEID
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, **ADOPTS** the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: May 30, 2024

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE